



February 13, 2017

The Honorable Robert Latta
Chairman
Subcommittee on Digital Commerce
and Consumer Protection
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Janice Schakowsky
Ranking Member
Subcommittee on Digital Commerce
and Consumer Protection
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Latta and Ranking Member Schakowsky:

Competitive Carriers Association (CCA)¹ respectfully submits this letter for the record regarding the hearing on “Self-driving Cars: Road to Deployment.” As autonomous vehicles take to our roadways, Americans will benefit from new automotive innovations that will impact commerce, tourism, commuting, and safety. In fact, several automotive innovations available today are supported by mobile broadband networks. In addition to emerging vehicle technologies, mobile broadband networks are the technological key that help make self-driving cars possible. Applications that will enhance consumers’ experience in self-driving vehicles and in-demand features will continue to run on mobile wireless networks.

Without strong, reliable, and ubiquitous mobile network infrastructure throughout the United States to support evolving technologies, autonomous vehicle capabilities will be limited. As Congress moves forward to support the rise of autonomous vehicles, it should consider policies to foster mobile broadband availability, including in rural areas, to support continued growth and innovation of autonomous vehicles and the applications that unleash their potential.

Competitive carriers serve some of the most rural parts of the country, in addition to the vast suburban areas that link urban and rural America. Gaps in service could prove detrimental to an autonomous vehicle presuming or relying on ubiquitous service to optimally perform outside or beyond a major metropolitan area. To provide necessary network coverage, carriers need mobile broadband infrastructure deployment policies and regulations that promote investment and buildout and streamline challenges and unnecessary red tape. This includes providing certainty regarding the siting process and timelines for application review as carriers seek to deploy or upgrade services. Unnecessary red tape, burdens, fees, or open-ended timeframes frustrate efforts to expand mobile

¹ CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents close to 200 associate members, including vendors and suppliers that provide products and services throughout the mobile communications ecosystem.

broadband. Removing barriers to deployment at federal, state, and local levels by adopting “dig once” and “deemed granted” policies, master applications, and the use of shot clocks will help competitive carriers meet the needs of unserved communities. Streamlining these processes is particularly important as carriers work to densify their networks or bring services to high cost areas. Additionally, carriers need certainty with regards to support from the Universal Service Fund (USF) to deploy and maintain mobile networks in high cost areas. Congress should support USF policies that preserve and expand mobile broadband in rural America.

Mobile networks connect roadways to support and enhance self-driving vehicles. Network quality and coverage is as important to ongoing autonomous vehicle innovation as the asphalt driverless cars will ride on. Congress and the Administration must include mobile broadband deployment in any infrastructure plan, ensure certainty of USF support to preserve and expand networks, and streamline the infrastructure deployment process to encourage expansion of mobile broadband services nationwide.

CCA thanks the Subcommittee for its leadership on this important issue, and appreciates the opportunity to assist your efforts on such a critical issue. We welcome any questions or comments you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven K. Berry". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Steven K. Berry
President & CEO

CC: Chairman Greg Walden
Ranking Member Frank Pallone